## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In re:	)	
	)	
CIRCUIT CITY STORES, INC., et al.,	) Case No. 08-35653	-KRH
	) Chapter 11	
Debtors.	) (Jointly Administer	red)

## **NOTICE OF MOTION AND HEARING**

**PLEASE TAKE NOTICE** that Woodlawn Trustees, Incorporated ("Movant"), by counsel, has filed a motion for an order compelling (a) Circuit City Stores, Inc. to immediately pay administrative rent pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b); and (b) granting related relief (the "Motion"). A copy of the Motion was mailed to you separately.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then by December 3, 2008, you or your attorney must:

1. File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before **December 3**, 2008.

William C. Redden, Clerk United States Bankruptcy Court 701 East Broad Street, Suite 4000 Richmond, VA 23219-1888

You must also deliver a copy to all parties on the Certificate of Service below and to:

Michael P. Falzone (VSB No. 22324) Sheila deLa Cruz (VSB No. 65395) Hirschler Fleischer, PC Post Office Box 500 Richmond, VA 23218-0500 (804) 771-9560 (804) 644-0957 (fax) Michael P. Falzone (VSB #22324) Sheila deLa Cruz (VSB #65395) Hirschler Fleischer, P.C. P.O. Box 500 Richmond, Virginia 23218-0500

2. Attend the hearing scheduled for **December 5, 2008 at 10:00 a.m.** before The Honorable Kevin R. Huennekens, in Courtroom 5000, United States Bankruptcy Court, 701 E. Broad Street, Richmond, Virginia 23219.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: November 25, 2008

WOODLAWN TRUSTEES, INCOPORATED

By:	/s/ Michael P. Falzone
Counsel	

Michael P. Falzone (VSB #22324) Sheila deLa Cruz (VSB No. 65395) Hirschler Fleischer PC The Edgeworth Building 2100 East Cary Street Post Office Box 500 Richmond, VA 23218-0500 (804) 771-9560 (804) 644-0957 (fax)

Counsel for Woodlawn Trustees, Incorporated

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of November, 2008, a true and correct copy of the foregoing was served on all persons receiving electronic notice in these cases and to the following parties:

Greg M. Galardi Skadden, Arps, Slate, Meagher & Flom One Rodney Square P.O. Box 636 Wilmington, DE 19899-0636 gregg.galardi@skadden.com Robert B. Van Arsdale Office of the United States Trustee 701 East Broad Street, Suite 4304 Richmond, VA 23219 Robert.B.Van.Arsdale@usdog.gov Assistant United States Trustee

and

Dion W. Hayes McGuire Woods, LLP One James Center 901 East Cary Street Richmond, VA 23219 dhayes@mcguirewoods.com Counsel for the Debtors

/s/ Michael P. Falzone
Michael P. Falzone